

Office of the Standing Chapter 13 Trustee  
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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**IN RE:  
KEVIN AYCOCK  
DEBTOR**

**CASE NO: 18-32632-HDH-13**

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**TRUSTEE'S OBJECTION TO CONFIRMATION**

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Now comes the Standing Chapter 13 Trustee herein and files this "Objection to Confirmation" of the Plan, filed herein by Debtor, and would respectfully show the Court as follows:

Trustee requests Amended form 122-C2 to show Debtor's current income is unemployment benefits of \$500 per week. Expenses have changed on the CMI.

The Trustee asserts that the Plan does not meet the requirements of 11 U.S.C. §1325(a)(6), which is known as the "feasibility test."

- Debtor is delinquent on Plan payments.

Debtor 1 is unemployed and Schedule I will need to be amended to reflect the changed circumstances once the Debtor obtains permanent employment or begins receiving unemployment compensation. Therefore, the Trustee is unable to recommend confirmation of the plan.

Trustee requests an Amended Schedule I that reflect loss of income to determine feasibility.

The Debtors Plan was late-filed and does not provide sufficient notice to creditors.

WHEREFORE, the Standing Chapter 13 Trustee prays that said Plan not be Confirmed unless and until it has been modified to cure all objections set forth herein above, and for general relief.

Respectfully submitted,  
THOMAS D. POWERS, CHAPTER 13 TRUSTEE

By: /s/ Tara Tankersley

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**KEVIN AYCOCK**

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